

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

In re Golden,

Debtor.

Tashanna B. Golden f/k/a Tashanna B.
Pearson,

Plaintiff,

v.

National Collegiate Student Loan Trust 2006-4,
GS2 2016-A, Pennsylvania Higher Education
Assistance Authority d/b/a American Education
Services and Firstmark Services,

Defendants.

Chapter 7

Case No. 16-40809 (ESS)

Adv. Pro. No. 17-1005 (ESS)

**DECLARATION OF GREGORY T. CASAMENTO IN OPPOSITION TO PLAINTIFF'S
MOTION FOR CLASS CERTIFICATION**

I, GREGORY T. CASAMENTO, hereby declare:

1. I am an attorney licensed to practice law in the State of New York and before the United States Bankruptcy Court for the Eastern District of New York. I am a partner of the law firm Locke Lord LLP, attorneys for defendants National Collegiate Student Loan Trust 2006-4 (the "2006-4 Trust") and Goal Structured Solutions Trust 2016-A, incorrectly sued herein as GS2 2016-A, (the "2016-A Trust") and as such am fully familiar with the facts set forth herein. I make this Declaration in opposition to Plaintiff Tashanna B. Golden f/k/a Tashanna B. Pearson's ("Plaintiff") Motion for Class Certification.

2. Attached hereto as **Exhibit A** is a true and correct copy of Plaintiff's Response to Defendants' Request for Admissions in this action.

3. Attached hereto as **Exhibit B** are excerpts from a true and correct copy of the transcript of the January 8, 2021 deposition of Elaine Varas conducted in this action.

4. Attached hereto as **Exhibit C** are excerpts from a true and correct copy of the transcript of the August 21, 2020 deposition of Mark Kantrowitz conducted in this action.

5. Attached hereto as **Exhibit D** is a true and correct copy of a Declaration executed by Mark Kantrowitz, dated February 2, 2021, in this action, with exhibits thereto.

6. Attached hereto as **Exhibit E** are excerpts from a true and correct copy of the transcript of the September 30, 2020 deposition of Plaintiff conducted in this action.

7. Attached hereto as **Exhibit F** is a true and correct copy of University of Pennsylvania, Student Financial Services, Account Snapshot – BRS History File, produced by non-party University of Pennsylvania in this action at bates numbers PENN_GOLDEN000001-07.

8. Attached hereto as **Exhibit G** is a true and correct copy of a Declaration executed by Anthony Henry, dated October 2, 2020, in this action, with exhibits thereto.

9. Attached hereto as **Exhibit H** are excerpts from a true and correct copy of the transcript of the November 13, 2020 deposition of Anthony Henry conducted in this action.

10. Attached hereto as **Exhibit I** is a true and correct copy of certain terms associated with Plaintiff's Non-Negotiable Credit Agreement, produced by Defendant Pennsylvania Higher Education Assistance Agency ("PHEAA") in this action at bates numbers PHEAA0000660-662.

11. Attached hereto as **Exhibit J** is a true and correct copy of Plaintiff's Non-Negotiable Credit Agreement, produced by the 2006-4 Trust in this action at bates number 2006-4_Golden_001139.

12. Attached hereto as **Exhibit K** is a true and correct copy of Plaintiff's Note Disclosure Statement, produced by the 2006-4 Trust in this action at bates number 2006-4_Golden_001140.

13. Attached hereto as **Exhibit L** is a true and correct copy of a Declaration executed by Tammy Kewley, dated October 22, 2018, in this action, with exhibits thereto.

14. Attached hereto as **Exhibit M** is a true and correct copy of Plaintiff's Disclosure Statement and Master Student Loan Promissory Note, produced by Defendant Firstmark Services in this action at bates numbers FM0022-24.

15. Attached hereto as **Exhibit N** is a true and correct copy of a Certification Tab produced by non-party Citibank in this action at bates number Citi_Golden_000059.

16. Attached hereto as **Exhibit O** is a true and correct copy of an Event History produced by non-party Citibank in this action at bates numbers Citi_Golden_000001-02.

17. Attached hereto as **Exhibit P** is a true and correct copy of a Declaration executed by John DeBois, dated July 8, 2020, in this action.

18. Attached hereto as **Exhibit Q** are excerpts from a true and correct copy of the transcript of the August 19, 2020 deposition of John DeBois conducted in this action.

19. Attached hereto as **Exhibit R** is a true and correct copy of a Supplemental Declaration executed by John DeBois, dated September 1, 2020, in this action.

20. Attached hereto as **Exhibit S** is a true and correct copy of the Amended and Restated Guaranty Agreement made as of May 13, 2002, by and between The Education Resources Institute, Inc. ("TERI") and Bank One, National Association, which was produced by the 2006-4 Trust in this action at bates numbers 2006-4_Golden_001264-1399.

21. Attached hereto as **Exhibit T** is a true and correct copy of the Thirteenth Amendment to Program Agreements by and among JP Morgan Chase Bank, N.A. (successor by merger to Bank One, N.A.), TERI, The First Marblehead Corporation, and US Bank, National Association, dated as of May 1, 2006, produced by Firstmark in this action at bates numbers FM-Golden 001006-1021.

Dated: New York, New York
June 29, 2021

LOCKE LORD LLP

/s/ Gregory T. Casamento
Gregory T. Casamento

CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of June, 2021, I caused a true and correct copy of the foregoing document to be served via CM/ECF upon all parties entitled to notice.

/s/ Gregory T. Casamento
Gregory T. Casamento